

McMANIMON, SCOTLAND & BAUMANN, LLC

75 Livingston Avenue, Suite 201

Roseland, New Jersey 07068

(973) 622-1800

Anthony Sodono, III, Esq. (asodono@msbnj.com)

Sari B. Placona, Esq. (splacona@msbnj.com)

Attorneys for Anthony Sodono, III, Temporary Receiver

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

v.

TRADERS GLOBAL GROUP INC., a New
Jersey corporation, d/b/a “My Forex Funds”;
TRADERS GLOBAL GROUP INC., a
Canadian business organization; and
MURTUZA KAZMI,

Defendants.

Civil Action No. 3:23-cv-11808-ZNQ-TJB

**CERTIFICATION OF ANTHONY SODONO, III, THE TEMPORARY
RECEIVER IN SUPPORT OF HIS APPLICATION TO EMPLOY NORTON
ROSE FULBRIGHT US LLP AND NORTON ROSE FULBRIGHT CANADA
LLP, AS SPECIAL COUNSEL**

ANTHONY SODONO, III, of full age, hereby certifies, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney at law duly admitted to practice before this Court. I am a member with the law firm of McManimon, Scotland & Baumann, LLC which maintains offices for the practice of law at 75 Livingston Avenue, Suite 201, Roseland, New Jersey 07068.

2. On August 29, 2023, I was appointed Temporary Receiver (“Temporary Receiver”) for Traders Global Group Inc., a New Jersey corporation, d/b/a “My Forex Funds”; Traders Global Group Inc., a Canadian business organization; and Murtuza Kazmi (the “Receivership Defendants”). See Docket No. 13.

3. This certification is submitted in connection with the proposed retention of Norton Fulbright US LLC and Norton Rose Fulbright Canada, LLP (collectively, “NRF”) as special counsel for the Temporary Receiver. See Docket No. 41.

4. NRF, nor any member thereof insofar as I, after due inquiry, have been able to ascertain, is or has been a creditor, an equity security holder, an insider of the Receivership Defendants, or has any other relationship with the Receivership Defendants or their agents, creditors, or other parties in interest, or their respective attorneys. Moreover, NRF, claims no interest in the suit or any of the parties thereto in any way which would disqualify them from serving the Temporary Receiver in good faith as a fiduciary for all of the beneficial owners and creditors of the estate, as contemplated by L. Civ. R. 66.1(g) of the Local Civil Rules of the United States District Court for the District of New Jersey.

5. NRF, nor any member thereof, insofar as I, after due inquiry, have been able to ascertain, is or has been, a director, officer or employee of the Receivership Defendants.

6. NRF, nor any member thereof, insofar as I, after due inquiry, have been able to ascertain, has an interest materially adverse to the interests of the Receivership Defendants or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Temporary Receiver or the Receivership Defendants.

7. NRF, nor any member thereof, insofar as I, after due inquiry, have been able to ascertain, holds or represents any interest materially adverse to the Temporary Receiver or the Receivership Defendants in the matters upon which NRF is to be engaged.

8. NRF, nor any member thereof, will, upon being retained, represent any other entity having an adverse interest in connection with this case.

9. It is necessary for me to retain NRF as my special counsel to assist in matters

relating to, among other things, communicating with the Ontario Securities Commission and, as needed, commencing proceedings in or otherwise appearing before Canadian courts, commissions, tribunals, and other authorities, and the recovery of estate assets including, but not limited to, cryptocurrency and digital assets.

10. NRF possesses the requisite experience in the fields of, among others, litigation, general corporate law, receiverships, securities and commodities laws and regulations, reorganization and restructuring, insolvency, bankruptcy, cryptocurrency, digital assets, and related matters, including, but not limited to, special expertise in cross-border restructuring and insolvency matters and Canadian securities law and proceedings before the Ontario Securities Commission and the Capital Markets Tribunal, as well as access to its global platform. In connection with this representation, NRF has assembled a highly qualified team of attorneys with experience in securities litigation, domestic and cross-border insolvency and bankruptcy, and cryptocurrency and digital assets to assist in connection with the matters covered by the Application.

I certify under penalty of perjury that the foregoing statements made by me are true and correct to the best of my knowledge, information, and belief.

Dated: September 21, 2023

/s/ Anthony Sodono, III
Anthony Sodono, III